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April 24, 1998

**NOTICE OF EX PARTE PRESENTATION**

**RECEIVED**

Ms. Magalie Roman Salas  
Secretary

Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

EX PARTE OR LATE FILED APR 24 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98 and Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

Please be advised that yesterday Commissioner Michael K. Powell and Kyle Dixon attended a live, on-line demonstration of the interfaces that Southwestern Bell offers to access its operations support systems (OSS) in Dallas, Texas. The purpose of the demonstration was to establish that Southwestern Bell is offering competitive local exchange carriers a variety of non-discriminatory means of accessing the OSSs, which satisfies section 271's competitive checklist requirements.

At the meeting, we provided Commissioner Powell and Mr. Dixon a copy of our March 1998 Competition Report, which is appended as Attachment 1. In addition, Commissioner Powell and Mr. Dixon were provided a copy of a sample CLEC order error report during the demonstration and that document is attached and labeled Attachment 2.

Should you have any questions concerning the foregoing, do not hesitate to contact me. In accordance with the Commission's rules, an original and one copy of this notification are submitted herewith.

Respectfully submitted,

*Todd F. Silbergeld*

Attachments

cc: The Hon. Michael K. Powell  
Mr. Kyle Dixon

## **SBC'S SUCCESS IN OPENING ITS LOCAL MARKETS: SIGNIFICANT LOCAL COMPETITION EXISTS AND IS GROWING**

### **March 1998 Report**

SBC (Southwestern Bell Telephone, Pacific Bell and Nevada Bell) has dedicated significant resources and investment to open its markets to local competition and to comply with all requirements contained in the 1996 Telecommunications Act. As described in detail below, SBC has made available products, services and systems required by Section 251 and the competitive checklist of the 1996 Act, and competitive local exchange carriers ("CLECs") have ordered and are actually using these checklist services and products to provide local service in all seven SBC states.

These indicators provide irrefutable evidence that new entrants are obtaining the network elements that they need from SBC to provide local service, that they are providing such exchange services to end users and that their ability to enter the market is unambiguous. Taken together, these data demonstrate that entry requirements into the local market in SBC's states have been eliminated, that competitive entry is occurring and that SBC has lost more than **849,100** lines to CLECs in SBC's states. As a result of SBC's compliance efforts, CLECs now have everything they need to compete against SBC and can use resale, interconnection or unbundled network elements to compete for and take SBC customers.

### **SBC's Capital and Expense Investments To Open Its Markets**

- Since the passage of the 1996 Act on February 6, 1996, SBC has devoted significant financial, technical and personnel resources to implement the market- and network-opening requirements of Sections 251 and 252 of the Act. SBC has spent more than \$1 billion and devoted more than 3,300 employees to implement the Act and open its local markets to competition— including but not limited to equipment, computer hardware, software and manpower. By the end of 1998, SBC estimates that it will have spent a total of \$1.5 billion making certain it meets the requirements of the Act.

### **Interconnection Agreements**

- Signed Agreements: SBC and CLECs have signed 280 interconnection and resale agreements within SBC's seven-state service area.
- PUC Approved Agreements: The various state commissions have approved 214 SBC-CLEC interconnection and resale agreements. These approved agreements give the CLECs everything they say they need to provide local services and compete against SBC. There are a large number of PUC approved agreements in each of SBC's states: Texas: 88; California: 27; Kansas: 24; Arkansas: 21; Oklahoma: 19; Missouri: 22 and Nevada: 13 approved agreements.
- Current Negotiations: SBC currently is in the process of negotiating more than 400 additional interconnection and resale agreements.

### **CLECs Competing Against SBC**

- As of the end of February 1998, more than 165 CLECs were operational in SBC's territory and passing resale, interconnection or UNE orders to SBC. Ninety CLECs were passing orders in Texas alone.

#### SBC Access Lines Lost to CLECs

- Through the end of February 1998, more than **849,100** access lines have been lost to CLECs through resale or through the establishment of new facilities-based service by CLECs in SBC's seven-state service area. Over 575,000 SBC lines have been resold by CLECs and more than 272,000 additional customers are being served on a facilities-basis by CLECs in SBC's territory.
- The approximate number of lines lost to CLECs in SBC's 7 states on a resale and facilities-basis is:

	<u>Resale Total</u>	<u>Resale Residential</u>	<u>Resale Business</u>	<u>Resale Priv. Coin</u>
a) California:	259,000	145,000	107,000	6,900
b) Texas:	244,000	186,000	46,000	11,000
c) Kansas:	35,800	17,100	18,600	0
d) Oklahoma:	13,300	11,100	2,200	13
e) Arkansas:	11,994	10,600	1,300	0
f) Missouri	9,000	4,000	4,900	0
g) Nevada	3,400	699	2,700	0
<b>RESOLD LINES:</b>	<b>576,300</b>	<b>375,300</b>	<b>182,700</b>	<b>18,300</b>

#### **FACIL.-BASED**

**LINES LOST: 272,800**

#### **SBC TOTAL**

**LINES LOST: 849,100**

- Resale activity is significant and growing in SBC's territory. SBC has demonstrated that its OSS can process CLEC resale orders in an accurate and timely manner without any backlogs. Resale activity (approximately 32,500 lines lost) stabilized in February, 1998, and this situation was primarily the result of decisions by AT&T and MCI to de-emphasize their residential resale activities. Nevertheless, even if the major IXC's chose for their own internal business reasons not to take advantage of the residential resale option made available to them by SBC because they do like the resale pricing decisions made by the PUCs, there can be no dispute that SBC has met its obligations under the Act to make resale available to competitors. The figures listed above demonstrate that SBC has made available to CLECs all the systems and services they need to compete on a resale basis in each of SBC's states.

#### FACILITIES-BASED COMPETITION STATUS:

The following figures demonstrate that SBC has opened its local markets to competition and that SBC is providing CLECs with the facilities and network elements they request from SBC in

order to compete on a facilities-basis in the local exchange market. Information is not available to SBC to identify with precise the full extent of facilities-based competition in each of its states. Available indicators underestimate the extent of facilities-based competition and are imperfect measures of competitive entry because each captures only that part of entry that requires action by SBC and does not capture the extent of facilities-based self-supply being undertaken by CLECs. Nevertheless, a review of CLEC E-911 listings and numbers ported demonstrates that there is significant and growing facilities-based competition in SBC's states and that more than **272,800** lines are being served on a facilities-basis by CLECs in SBC's states.

- SBC is making available to CLECs through 214 PUC-approved interconnection agreements and its new and modified systems and networks, all products, services and systems that CLECs need to provide facilities-based or UNE-based local service to residential and business customers.

#### CLEC E-911 Numbers—First Indicator of Facilities-Based Competition

- CLEC listings in the E-911 database is one indicator of access lines being served on a facilities basis by facilities-based carriers. These listings show that CLECs serve at least 272,800 lines in SBC's 7 states on a facilities basis. CLECs have requested E-911 service for more than 272,800 lines from their own NXX Codes that were assigned to them to provide facilities-based service.
- In California alone, 14 facilities-based carriers serve more than 243,000 lines on a facilities basis, based on E-911 listings. CLEC E-911 listings indicate that there is at least the following number of lines being served on a facilities-basis in the other SBC states: Texas: 13,854; Oklahoma: 11,802; Missouri: 1,657; Arkansas: 1,400; and Kansas: 1,111 facilities-based lines.

#### Numbers Ported—Second Indicator of Facilities-Based Competition

- More than 44,600 existing SBC lines have been ported via interim number portability to facilities-based competitors. This is one indicator of facilities-based competition that has occurred in SBC's seven states, but it underestimates the actual amount of facilities-based competition that has occurred. Each of the numbers ported represents conversion of an existing line from SBC to a facilities-based CLEC provider. It should be noted, however, that lines do not have to be ported when CLECs serve new lines/customers on a facilities-basis and that SBC has no precise method for determining exactly how many additional lines or customers are being served by facilities-based providers in its seven states.

#### UNEs, Interconnection and Other Facilities-Based Products Provided By SBC to CLECs

- Interconnection Trunks: SBC's provisioning of local interconnection trunks is an indicator that actual local exchange traffic is being exchanged between CLECs and SBC. SBC has provisioned more than 216,000 one-and two-way interconnection trunks to CLECs in SBC's seven-state service area. These trunks allow CLECs to connect their networks and customers to SWBT's network. 128,000 of these trunks were provisioned in California and 86,000 interconnection trunks were provided to CLECs in the SWBT five-state region.
- Unbundled Loops: Unbundled loops are the direct connection between the local network and customer's premises. CLECs can provision loops themselves, or they can lease unbundled loops from SBC or other suppliers. Because CLECs can self-provision loops, the number of

unbundled loops provided by SBC understates the extent of existing facilities-based competition. Nevertheless, more than 41,000 unbundled loops have been provisioned by SBC to CLECs in SBC's seven states. In addition, more than 270 unbundled switch ports have been requested by and provided to CLECs by SBC.

- CLEC Collocation Arrangements: Collocation is an important measure of competitive facilities-based presence because once a competitor is collocated in an SBC central office it has access to every loop connected to that central office. More than 285 physical collocation arrangements are operational in SBC's seven-state service area -- 54 of these are in SWBT's region, with 219 in California/ Nevada.
- 250 physical collocation arrangements (78 in SWBT and 143 in California/Nevada) are currently being worked on and pending completion.
- More than 50 virtual collocation arrangements are operational in SWBT's five-state territory, with an additional 6 virtual collocation arrangements pending completion.
- E-911 Trunks: CLECs have requested and SBC has provisioned 526 operational E-911 trunks to CLECs in SBC's seven-state service area. Of this number, 372 are located in California and about 152 are in SWBT states.
- DA/OS Trunks: More than 700 Directory/Operator Assistance trunks have been provisioned by SWBT to CLECs in the five SWBT states.

#### Reciprocal Compensation – Another Indicator That SBC's Networks Are Open

- Reciprocal compensation minutes of use is another indicator that demonstrates that actual local traffic is being exchanged between CLECs and SBC. A substantial amount of traffic has been exchanged between SBC and CLECs, with most of that traffic (and the corresponding reciprocal compensation) going from SBC to the CLECs. For example, more than **3.3 billion** minutes of local traffic (excluding Internet traffic) has been exchanged between SWBT/Pacific Bell/Nevada Bell and CLECs over interconnection trunks. More than 90% of this local traffic has been exchanged from SBC to CLEC networks. It should be noted, that these minutes do not capture all local minutes being generated by CLECs because they do not include CLEC-to-CLEC traffic or on-net (i.e., intra-CLEC) traffic.
- In addition, the fact that an additional **3.7 billion** minutes of Internet traffic has been exchanged between SBC and CLEC networks also demonstrates that SBC's networks have been opened to competition. These minutes-of-use numbers confirm that SBC's networks are open to and connect with CLEC networks.

#### Telephone Numbers Requested By and Assigned to CLECs

- More than 1,922 NXX codes (each code representing 10,000 numbers) have been assigned to CLECs in SBC's seven-state service area, with an additional 120 assignments pending. In other words, CLECs have requested and SBC has assigned 19.2 million telephone numbers to CLECs in its seven states; more than 10.9 million numbers have been requested by CLECs in California and an additional 8.2 million numbers have been requested in SWBT's five states.

#### Access to SBC White Page Directories

- CLEC information can be included in all White Page directories in SBC's seven state service areas. SBC has provided more than 417,000 white page listings for CLEC customers.

#### Access to SBC Poles and Conduits

- SBC has provided competitors with access to more than 373,000 of its poles and approximately 7.5 million feet of conduit space for their use to compete against SBC in its seven states.

#### CLEC Orders Handled by SBC's OSS and Local Service Centers

- Since the 1996 Act passed, SBC's OSS and Local Service Center personnel have handled more than 1.5 million service orders from CLECs to order facilities, network elements and resold or second lines for their customers, change or add vertical services etc. Almost 1 million orders from CLECs have been processed in the SWBT five-state region and more than 560,000 orders have been processed in California/Nevada. The fact that SWBT processed more than 730,000 orders in 1997, and an additional 135,000 orders in February 1998 alone, without a backlog, is strong evidence that SBC has developed state-of-the-art OSS and that these systems are being used by CLECs to compete in the local market against SWBT. Orders are also being processed in California in a similar timely and accurate manner without any backlogs.
- SBC also demonstrated in Texas that its OSS (which is the same system used in all five SWBT states) could handle large increases in volumes from CLECs. Over 843,000 CLEC service orders in Texas have been processed, with over 105,000 orders processed in February 1998 alone. SBC's OSS and Local Service Centers have handled the increased volume of service orders without experiencing a backlog.

#### Conclusion

- The resale, interconnection, facilities-based and OSS-related numbers listed above, provide strong and compelling evidence that SBC has opened each of its seven states to resale, facilities-based and UNE competition and that SBC provides CLECs with all the systems and services they need to capture SBC's local customers.
- A neutral examination of the record unequivocally confirms that SBC has complied with the 1996 Act and has opened its local markets to competition.

**SBC's Section 251 / Checklist Provisioning Status**

- ☒ End of Month Report  
☐ Mid-Month Update  
☐ Data through 2/98 (unless otherwise noted)  
☐ Shaded data through 1/98 (unless otherwise noted)

Report Date 3/21/98

*Green, italicized, bolded data is corrected from previous edition*

#	CHECKLIST DESCRIPTION	PRODUCTS PROVIDED	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
1	Interconnection for the transmission and routing of telephone exchange service and exchange access at any technically feasible point within the carrier's network	<b>Total Trunks Trunks Provided to CLECs</b> One Way Trunks (SBC to CLEC) One Way Trunks (CLEC to SBC) Two Way Trunks <b>Physical Collocation</b> Operational Cages Pending Cages <b>Virtual Collocation</b> Operational Arrangements Pending Arrangements <b>Number of Collocated Wire Centers (Note 1)</b>	3,790 2,360 572 858 6 2 2 0 3	2,208 1,056 348 804 3 5 6 0 4	6,367 4,156 1,431 780 6 24 8 0 7	8,106 6,369 1,185 552 14 5 3 2 11	66,122 38,966 15,795 11,361 36 70 35 4 29	86,593 52,907 19,331 14,355 65 106 54 6 54	128,386 12,504 1,560 114,322 219 143 0 2 94	1,477 0 0 1,477 3 1 0 0 3	216,456 65,411 20,891 130,154 287 250 0 0 151
2	Nondiscriminatory access to network elements (In addition: See Items 3-6 below)	<b>Number of CLECs passing orders in 1998</b> <b>Total orders processed (2/6/96 - 2/98) *</b> Manual Electronic <b>Total orders processed in 1997 *</b> Manual Electronic <b>Total orders processed in 1998 *</b> Manual Electronic <b>Total orders processed in February 1998 *</b> Manual Electronic	10 36,393 36,393 0 19,035 19,035 0 17,358 17,358 0 11,633 11,633 0	10 56,835 40,287 16,548 41,476 28,972 12,504 15,359 11,315 4,044 8,106 6,194 1,912	15 12,329 12,136 193 6,396 6,309 87 5,929 5,823 106 4,011 3,937 74	11 36,275 32,389 3,886 22,832 20,408 2,424 13,439 11,977 1,462 7,109 6,238 871	90 843,562 657,567 185,995 641,098 495,077 146,021 160,860 120,886 39,974 74,826 56,420 18,406	136 985,394 778,772 206,622 730,837 569,801 161,036 212,945 167,359 45,586 105,685 84,422 21,263	26 560,524 100% in 1996 0% in 1996 491,327 ~ 80% ~ 20% 68,936 ~ 80% ~ 20% 28,364 ~ 80% ~ 20%	4 3,511 3,511 0 3,511 3,511 0 1,429 1,429 0 884 884 0	166 1,549,429 0 1,225,675 0 283,310 0 134,934 0
3	Nondiscriminatory access to poles, ducts, conduits and rights of way	Total Number of Poles Attached (Note 2) Total Feet of Duct Occupied (Note 2)	112 71,996	22 6,149	415 61,600	186 34,761	2,080 113,977	2,815 288,483	370,060 7,236,650	508 16,225	373,383 7,541,358
4	Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services	<b>Unbundled Loops</b>	185	176	450	459	199	1,469	33,891	5,729	41,089
5	Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services	<b>Unbundled Transport</b> Dedicated Transport Available? Shared Transport Available?	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes	Yes Yes
6	Local switching unbundled from transport, local loop transmission or other services	<b>Unbundled Switch Ports</b>	0	0	0	0	172	172	100	0	272
7	Nondiscriminatory access to 911 and E911, directory assistance, and operator call completion services	E911 Trunks (not included in Item 1 Total) DA/OA Trunks (not included in Item 1 Total) CLECs using Directory Assistance Service (Note 3 & Special Note 3) CLECs using "0" Call Completion Service (Note 3 & Special Note 3) Are CLECs offered E-911 service directly to government bodies or interconnecting with SBC's existing service arrangements?	16 64 7 7 Yes	16 0** 9 9 Yes	11 78 12 12 Yes	18 64 9 9 Yes	91 498 83 83 Yes	152 704 93 93 Yes	372 0 Data Not Available Data Not Available Yes	2 18 Data Not Available Data Not Available Yes	526 722 0 0 Yes
8	White pages directory listing for customers of other carrier's telephone exchange service	<b>Number of CLEC End User White Pages listings</b> Resale Facilities Based Total	11,010 162 11,172	23,303 55 23,358	5,285 96 5,381	11,429 89 11,518	166,425 2,199 168,624	217,452 2,601 220,053	188,212 7,779 195,991	1,142 547 1,689	406,806 10,927 417,733
9	Nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers (Note 4)	<b>Telephone Numbers Provided to CLECs</b> Numbers Assigned Numbers Pending Assignment	120,000 0	70,000 0	680,000 0	330,000 0	7,010,000 30,000	8,210,000 30,000	10,980,000 90,000	30,000 0	19,220,000 120,000
10	Nondiscriminatory access to databases and associated signaling necessary for call routing and completion	Access to 800, Line Information Database (LIDB), Calling Name Delivery Database (CNAM), and SS7 Signaling Network Available?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

# SBC's Section 251 / Checklist Provisioning Status

- ☒ End of Month Report  
☐ Mid-Month Update  
☐ Data through 2/98 (unless otherwise noted)  
☐ Shaded data through 1/98 (unless otherwise noted)

Report Date 3/21/98

Green, italicized, bolded data is corrected from previous edition.

#	CHECKLIST DESCRIPTION	PRODUCTS PROVIDED	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
11	Interim number portability through RCF or DID trunks. Each line ported represents conversion of an existing line from SBC to a facilities-based provider	Lines Converted via INP Residential Lines Business Lines Total	0 987 987	0 409 409	0 452 452	0 6,959 6,959	37 8,138 8,175	37 16,945 16,982	1,148 18,191 19,339	0 8,286 8,286	1,185 43,422 44,607
12	Nondiscriminatory access to services and information required to allow implementation of dialing parity	Are additional access codes or digits needed to complete local calls to or from CLEC customers? IntraLATA toll dialing parity available concurrent with SBC's provision of interexchange service?	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes	No Yes
13	Reciprocal compensation arrangements (Note 5)	Minutes of Use Exchanged Over Interconnection Trunks in 1997 (in Millions) From SBC to CLEC From CLEC to SBC Total  Minutes of Use Exchanged Over Interconnection Trunks in 1998 (in Millions) From SBC to CLEC From CLEC to SBC Total  Minutes of Use Exchanged Over Interconnection Trunks in February 1998 From SBC to CLEC From CLEC to SBC Total	27.7 6.6 34.3  7.4 0.0 7.4  3,468,466 9,238 3,477,704	0.0 0.0 0.0  0.0 0.0 0.0  0 0 0	13.2 0.0 13.2  10.4 0.0 10.4  4,926,410 0 4,926,410	83.9 4.0 87.9  20.8 5.4 26.2  11,126,695 2,713,294 13,839,989	118.6 49.1 167.7  60.7 78.3 138.9  24,316,475 30,767,591 55,084,066	243.4 59.7 303.1  99.2 83.7 182.9  43,838,046 33,490,123 77,328,169	2,549.4 284.6 2,834.0  Data Not Available  Data Not Available	0.1 0.0 0.1  0.0 0.0 0.0  2,744 0 3,443	2,792.9 344.3 3,137.2  99.2 83.7 182.9  43,838,046 33,490,123 77,328,169
14	Offering for resale at wholesale prices any telecommunications services offered at retail to subscribers who are not themselves carriers	Resold Access Lines Business Lines (Simple and Complex) Private Coin Lines Residential Lines Total	1,306 0 10,688 11,994	18,654 0 17,146 35,800	4,932 0 4,098 9,030	2,235 13 11,140 13,388	46,061 11,386 186,492 243,939	73,188 11,399 229,564 314,151	106,792 6,912 145,063 258,767	2,744 0 699 3,443	182,724 18,311 375,326 576,361

Note 1: CA collocated wired centers total reflects physical arrangements only

Note 2: CA and NV data updated quarterly

Note 3: SWBT total counts each CLEC once, although it may appear in multiple states

Special Note 3: January report counted CLECs operating within a state as both

a reseller and facilities based provider as two CLECs. This report counts the CLEC only once

Note 4: Each NXX Code equals 10,000 telephone numbers

Note 5: Totals do not include disputed Internet minutes of use. However, the fact that over 3.712B minutes of Internet traffic have been exchanged between SBC and CLEC networks in 1997 and 1998 also demonstrates that SBC's networks have been opened to competition.

1997 totals include Local, Optional EAS, and IntraLATA toll MOU. 1998 numbers include only Local and Optional EAS traffic.

\* CA Order Volumes include Resale activity only. All others include Resale and Facilities Based orders.

\*\* KS does have OAD/DA trunks. In process of splitting those OAD/DA trunks terminating and counted in KC, MO that serve both KS and MO

CLECs with Certifications	AR	KS	MO	OK	TX	SWBT's 5 States	CA	NV	SBC TOTAL
Number Approved	17	43	36	33	149	278	116	52	446
Number Pending	23	12	13	13	20	81	28	8	117
CLEC Interconnection Agreements (as of 3/20/98)									
Number Signed	27	34	34	33	109	237	30	13	280
Number Approved	21	24	22	19	88	174	27	13	214
Number of Arbitrations Completed	0	3	3	1	11	18	4	0	22
Number of Arbitrations In Progress	1	0	0	0	1	2	0	1	3
Number Under Negotiation	52	50	58	55	130	345	35	22	402





## Competition

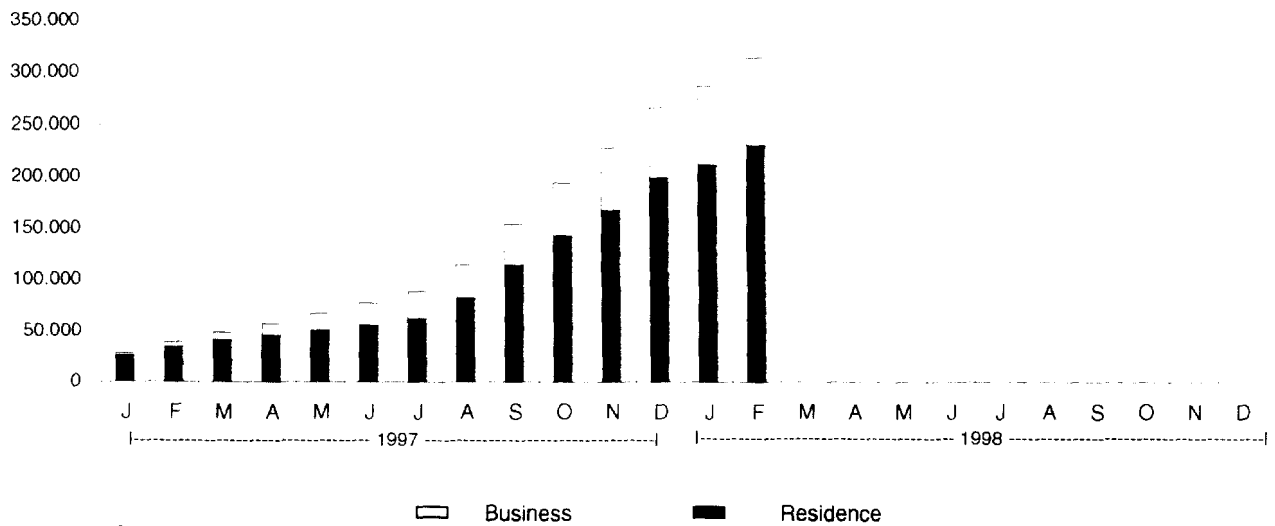
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### *SBC meets the 14 point competitive checklist*

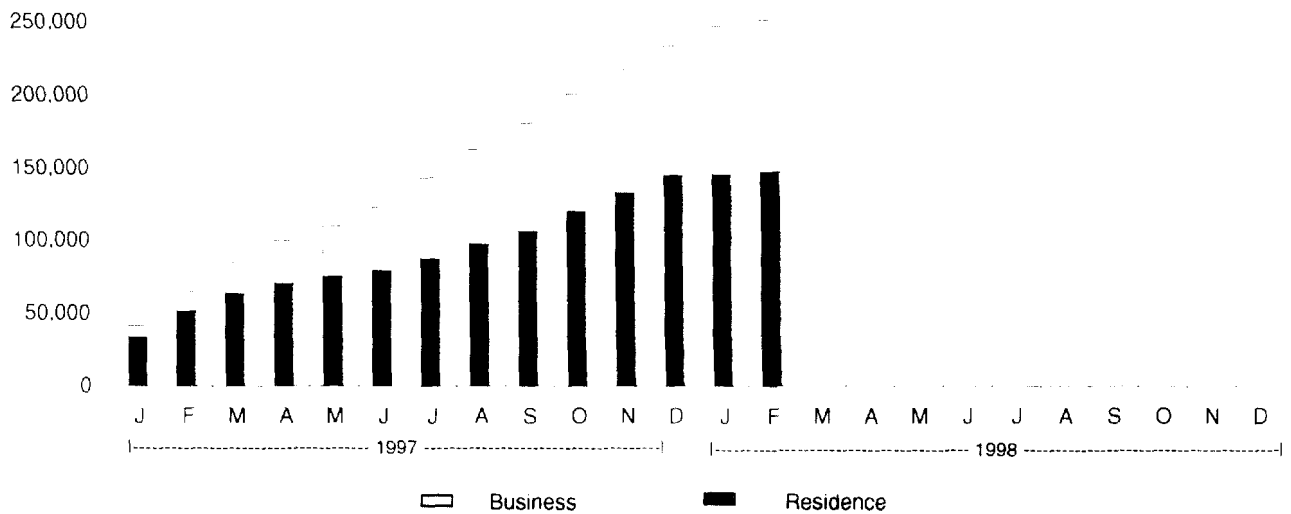
- ☒ **Interconnection**
  - » 214 Approved Agreements
- ☒ **Unbundled Network Element Access**
  - » 56,100 UNE elements purchased
- ☒ **Nondiscriminatory Access to Outside Plant**
  - » 7.5 million duct feet occupied
  - » 373 thousand pole attachments
- ☒ **Unbundled Local Loops**
  - » 41,089 loops purchased
- ☒ **Unbundled Local Transport**
  - » 341 Collocation Instances
- ☒ **Unbundled Local Switching**
  - 272 Switch Ports
- ☒ **Nondiscriminatory Access to 911, Directory Assistance and Call Completion Services**
  - » 526 E911 Trunks
  - 722 DA/OA Trunks
- ☒ **White Pages Directory Listings**
  - » 417,733 listings
- ☒ **Nondiscriminatory Access to Number assignment**
  - » 1,922 NXX codes assigned/opened
  - » 12 NXX codes pending
  - » Ability to serve 19+ million lines
- ☒ **Nondiscriminatory access to Signaling and Databases**
- ☒ **Number Portability**
  - » 44,607 INP Lines Converted
- ☒ **Dialing Parity**
- ☒ **Reciprocal Compensation**
  - » 3.1 Billion MOUs exchanged in 1997 (excludes internet MOUs)
- ☒ **Resale**
  - » 563 CLECs have filed, 446 certified
  - » 166 CLECs sending orders in 1998
  - » 576,361 access lines

# SBC Resold Lines - Cumulative Resale Lines Lost to CLECs

## Southwestern Bell Telephone



## Pacific Bell

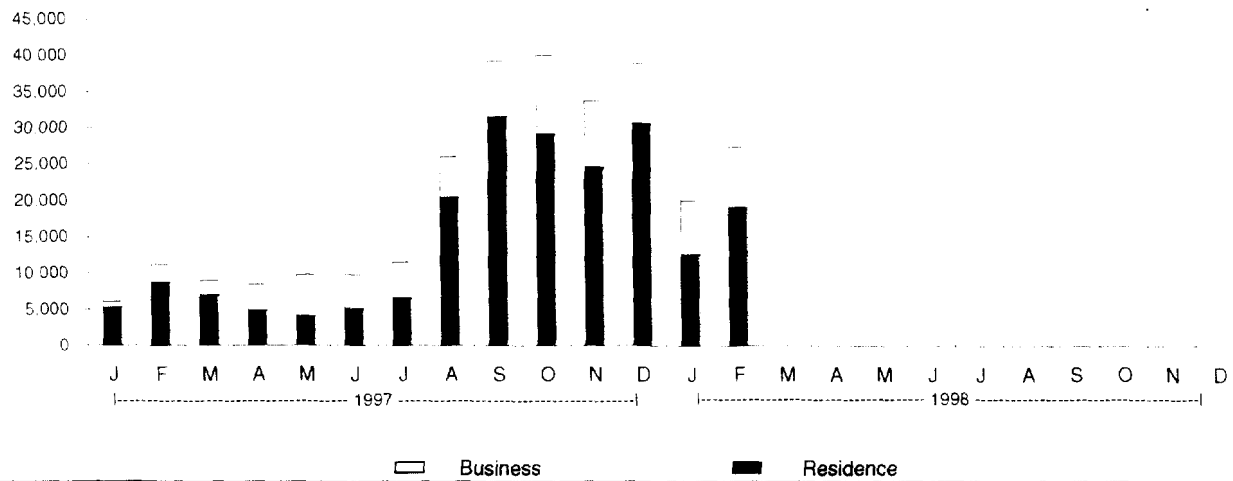


## SBC Consolidated

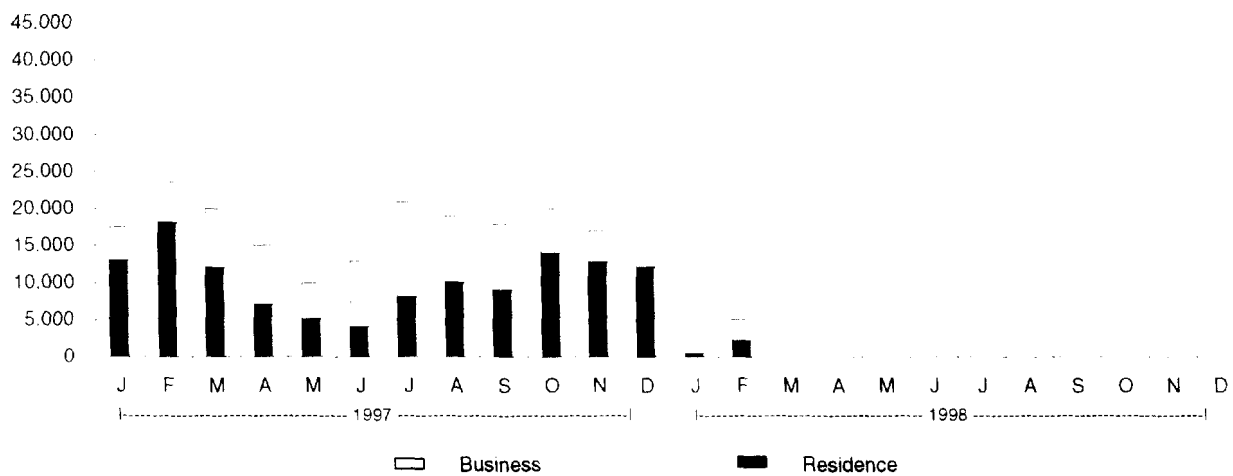


# SBC Resold Lines - Monthly Resale Lines Lost to CLECs

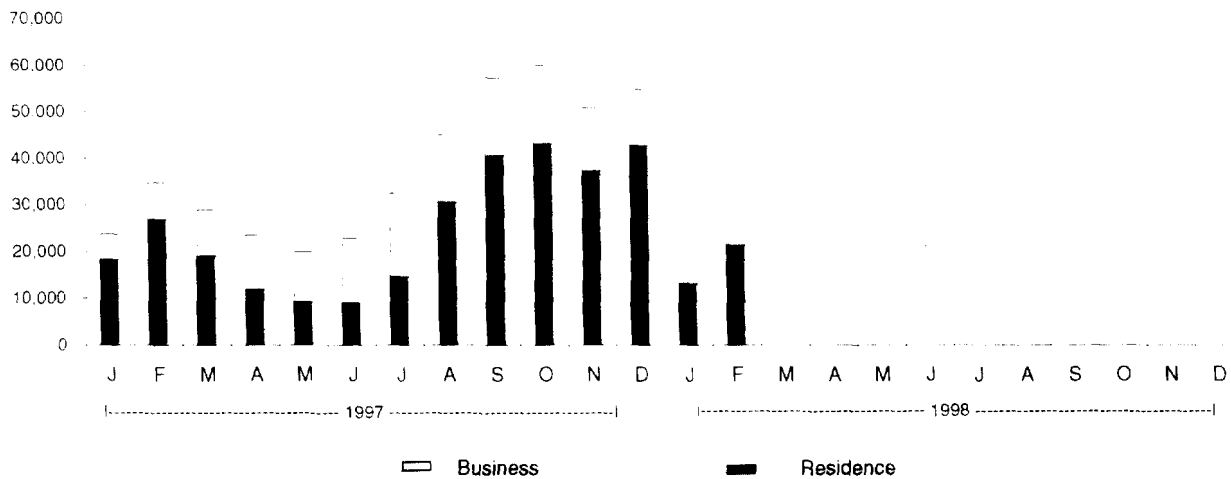
## Southwestern Bell Telephone



## Pacific Bell



## SBC Consolidated



	REQUE ED DATE	04-16-98								
	ANSWERED DATE									
	TEXAS ESOI /ERROR LOG									
#	Customer Name	Phone Number	Order Number	Initial Due Date	New Due Date	Prem Visit Req (Y or N)	Address	Zip	Detailed Description of Error/Problem	Status/Resolution
1				3/26/98	X		610 OVERBY		NEED DRIVING INSTRUCTIONS & DESCRIPTION OF HOUSE	sent letter. Follow up 5-1-98
2				4/16/98	X		3808 HOWARD ST		WSC,DIFF NAME	sent letter. Follow up 5-1-98
3				4/17/98	4/17/98		7205 W 39TH		CHANGED TN TO	complete fyi
4				4/16/98	X		9326 BECK AV APT.127		WSC,DIFF NAME	sent letter. Follow up 5-1-98
5				4/16/98	X		6575 GESSNER APT.202		VERIFY ADDRESS	gave susan at lsc new address
6				4/16/98	X		4502 AV G APT.B		VERIFY ADDRESS	sent letter. Follow up 5-1-98
7				4/16/98	X		2400 COOPER ST		THIS IS A DUPLICATE ORDER OF C601698, CAN WE CANCEL?	yes